REMARKS

This Amendment and Request for Reconsideration is submitted in response to an outstanding Office Action dated January 29, 2004, the shortened statutory period for response having expired on April 29, 2004. Accordingly, a Petition and Fee for Extension of time are included herewith.

I.   Status of the Claims

Please amend claims 1, 2, 5, 8, 9, 13, 15, and 16 as indicated above. Claims 1-18 are now pending in the application. Claims 1, 5, 9, 13, and 16 are independent claims.

Applicants acknowledge the Examiner's citation of statutory authority as a basis for claim rejections.

II.   Rejections under 35 U.S.C. § 102

The Examiner has rejected claims 1, 2, 4, 5, 7-9, 11-13 and 16 under 35 U.S.C. § 102(b) as being anticipated by Besaw (U.S. Patent No. 5,276,789). Applicant respectfully traverses the rejection.

Claim 1 recites a method for graphically representing interactions between units of individuals within an organization, which comprises: providing a graphical object corresponding to each unit of individuals; positioning said graphical objects to correspond to the relative positions of the units of individuals within the organizational hierarchy; varying graphical properties of said graphical objects to correspond to preselected attributes of the units of individuals; and displaying on a display screen said graphical objects and interactions between the units of individuals represented by said graphical objects.

Claim 5 recites a method for graphically representing interactions between individual members within a unit of an organization, which comprises: providing a graphical object corresponding to each individual member of the unit; positioning said graphical objects to

correspond to the relative positions of the individual members within the unit hierarchy; varying graphical properties of said graphical objects to correspond to preselected attributes of the individual members; displaying on a display screen said graphical objects and interactions between the individual members represented by said graphical objects; and displaying on said display screen other related units within the organization.

Claim 9 recites a method for graphically representing interactions between an individual member and other members within an organization, which comprises: providing graphical objects corresponding to the interacting individual members; varying graphical properties of said graphical objects to correspond to preselected attributes of the individual members; displaying on a display screen said graphical objects; and displaying on said display screen direct interactions between the individual members and indirect interactions between the individual members to a preselected depth level.

Claim 13 recites a method for graphically representing interactions between hypothetical units of individuals within an organization, which comprises: forming the hypothetical units of individuals based on analysis of interaction data between members of actual units within the organization; providing a graphical object corresponding to each hypothetical unit of individuals; varying graphical properties of said graphical objects to correspond to preselected attributes of the hypothetical units of individuals; and displaying on a display screen said graphical objects and interactions between the hypothetical units of individuals represented by said graphical objects.

Claim 16 recites a method for graphically representing interactions between individual members of units within an organization, which comprises: providing graphical objects corresponding to the individual members; positioning said graphical objects such that the individual members of each unit are clustered together; varying graphical properties of said

graphical objects based on connectivity and diversity measures of the corresponding individual members; and displaying on a display screen said graphical objects.

In the independent claims, the method involves graphical representations of interactions between: units of individuals within an organization, individual members within a unit of an organization; an individual member and other members within an organization; or hypothetical units of individuals within an organization. In contrast, Besaw discloses graphic representations of network topology but does not disclose graphical representations of interactions between individuals. Applicant respectfully submits that Besaw does not disclose or suggest all of the features of the independent claims, because a computer network topology is fundamentally different than interactions between individuals, units of individuals or hypothetical units of individuals. Accordingly, applicant asks that the rejection as to this basis be withdrawn.

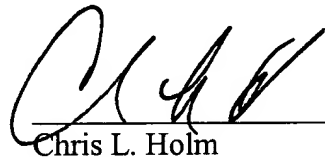III.   Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 3, 6, 10, 14, 15, 17, and 18 under 35 U.S.C. § 103 as being unpatentable over Besaw in view of Bereiter (U.S. Patent No. 5,909,217). Applicant respectfully traverses the rejection.

For the reasons stated above, Besaw does not disclose all of the features of independent claims 1, 5, 9, 13, or 16. Bereiter also discloses maps of network nodes, but does not disclose interactions between individuals. Rejected claims 3, 6, 10, 14, 15, 17 and 18, depend from independent claims 1, 5, 9, 13, or 16, and include the limitations of the independent claims. Accordingly the combination of Besaw and Bereiter does not disclose all of the features of dependent claims 3, 6, 10, 14, 15, 17 and 18, and applicants asks that the rejection as to this basis be withdrawn.

IV.   Request for Reconsideration

Applicants respectfully submit that the claims of this application are in condition

for allowance. Accordingly, reconsideration of the rejection and allowance is requested. If a

conference would assist in placing this application in better condition for allowance, the

undersigned would appreciate a telephone call at the number indicated.

Respectfully submitted,
Milbank, Tweed, Hadley & McCloy LLP

May 24, 2004

Chris L. Holm
Reg. No.: 39,227

Milbank Tweed Hadley & McCloy LLP
1 Chase Manhattan Plaza
New York, NY 10005
(212) 530-5000 / (212) 530-5219 (facsimile)